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UNITED STATES OF AMERICA

DISTRICT OF NEVADA

ALEX MANESSIS,

Plaintiff,

Vs.

MIDLAND CREDIT MANAGEMENT,
INC., MIDLAND FUNDING, LLC AND
ENCORE CAPITAL GROUP, INC.,

Defendant.

2:18-cv-00286-GMN-GWF

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER;
SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)**

Pursuant to Fed R. Civ. P. 26 and LR 26-1, Plaintiff ALEX MANESSIS and Defendants MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC AND ENCORE CAPITAL GROUP, INC., through their counsel, submit the following Stipulated Discovery Plan and Scheduling Order for this Court's review and approval.

1. **Fed. R. Civ. P. 26(f) Meeting:** The parties met for a Fed. R. Civ. P. 26(f) conference on June 12, 2018.
2. **Discovery Plan:** Discovery will be needed concerning the allegations in the Complaint.
 - a. **Initial Disclosures:** The parties will make their respective Fed. R. Civ. P. 26(a)(1) initial disclosures by June 26, 2018.

1 b. **Discovery Cut-Off Date LR 26-1(e)(1):** All discovery shall be completed by
2 November 6, 2018.

3 c. **Fed. R. Civ. P. 26(a)(2) Expert Disclosures (LR 26-1(e)(3)):** Disclosure of
4 experts shall proceed according to Fed R. Civ. P. 26(a)(2) except that, pursuant
5 to Local 26-1(e)(3):

6 i. The disclosure of the parties' initial experts and expert reports shall
7 occur on September 4, 2018, which is 60 days prior to the close of
8 discovery, and;

9 ii. The disclosure of the parties' rebuttal experts and expert reports shall
10 occur on Monday, October 8, 2018, which is 34 days after the parties'
11 disclosure of initial experts.
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14 3. **Amending the Pleadings and Adding Parties (LR 26-1(e)(2)):** The parties shall have
15 until August 7, 2018 to file any motions to amend the pleadings or add parties, which is
16 90 days before the discovery cut-off date.

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18 4. **Dispositive Motions (LR 26-1(c)(4)):** The parties shall have until December 3, 2018 to
19 file dispositive motions, which is 30 days after the completion of discovery.

20 5. **Pretrial Order (LR 26-01(e)(5)-(6)):** The joint pretrial order shall be filed by January
21 2, 2019, which is not more than 30 days after the date set for filing dispositive motions
22 in this case. If dispositive motions are filed, the date for filing the joint pretrial order
23 shall be suspended by thirty (30) days after the decision on the dispositive motions or
24 by further order of the Court. The disclosures required by Fed. R. Civ. P. 26(a)(3) shall
25 be included in the joint pretrial order.
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- 1 6. **Interim Status Report (LR 26-3):** The parties shall file the interim status report
2 required by LR 26-3 by September 4, 2018, which is not later than 60 days before the
3 discovery cut-off.
- 4 7. **Alternate Dispute Resolution.** The parties certify that they have met and conferred
5 about the possibility of using alternative dispute-resolution processes, including
6 mediation, arbitration, and if applicable, early neutral evaluation.
- 7 8. **Alternate Forms of Case Disposition.** The parties certify that they considered consent
8 to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed R. Civ. P. 73 and use of
9 the Short Trial Program (General Order 2013-01).
- 10 9. **Electronic Evidence.** The parties certify that they have discussed whether they intend
11 to present evidence in electronic format to jurors for the purposes of jury deliberations.
12 At this time, the parties do not intend to present evidence in electronic format to the
13 jury.
- 14 10. **Court Conference:** The parties do not request a conference with the Court before entry
15 of the scheduling order.

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19 Respectfully submitted June 21, 2018.

20
21 Dated: June 21, 2018

22 /s/ Craig K. Perry

23 Craig K. Perry

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Dated: June 21, 2018

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ORDER

IT IS SO ORDERED:

GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE

DATED: _____